

FILED

AUG 13 2024

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA

Heidi D. Campbell, Clerk
U.S. DISTRICT COURT

BRANDE LEE SAMUELS

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-against-

CITY OF TULSA ET. AL.

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names. Do not include addresses here.)

**Complaint for Violation of Civil
Rights**

(Non-Prisoner Complaint)

Case No. 24 CV - 375 JFH - MTS
(to be filled in by the Clerk's Office)

Jury Trial: ☒ Yes ☐ No
(check one)

NOTICE

Federal Rules of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the filing fee or an application to proceed *in forma pauperis*.

fee due
of summons

I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name Brandi L. Samuels
 Street Address General Delivery
 City and County Tulsa, Tulsa County
 State and Zip Code Oklahoma [74103]
 Telephone Number (918) 407-8224
 E-mail Address _____

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known) and check whether you are bringing this complaint against them in their individual capacity or official capacity, or both. Attach additional pages if needed.

Defendant No. 1

Name G.T. Bynum
 Job or Title Mayor
 (if known)
 Street Address 175 E. 2nd St., Ste 15129
 City and County Tulsa, Tulsa County
 State and Zip Code Okla. 74103
 Telephone Number (918) 596-7411
 E-mail Address cityoftulsa.org
 (if known)

☒ Individual capacity ☒ Official capacity

Defendant No. 2

Name V.e Regalado
 Job or Title ~~3000~~ ~~Deputy Sheriff~~
 Tulsa County Sheriff

(if known)

Street Address

303 W. 1st St

City and County

Tulsa, Tulsa County

State and Zip Code

Okla. 74103

Telephone Number

E-mail Address

(if known)

☐ Individual capacity

☒ Official capacity

Defendant No. 3

Name

Wendell Franklin

Job or Title

Chief of Police

(if known)

Street Address

600 Civic Center, Ste 200

City and County

Tulsa, Tulsa County

State and Zip Code

Okla. 74103

Telephone Number

(918) 596-9227

E-mail Address

tulsapolice.org

(if known)

☐ Individual capacity

☒ Official capacity

Defendant No. 4

Name

Kimberly Johnson

Job or Title

CEO

(if known)

Street Address

400 Civic Center

City and County

Tulsa, Tulsa County

State and Zip Code

Okla. 74103

Telephone Number

(918) 549-7323

E-mail Address

tulsalibrary.org

(if known)

☒ Individual capacity

☒ Official capacity

II. Basis for Jurisdiction

Under 42 U.S.C. § 1983, you may sue state or local officials for the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” Under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. Are you bringing suit against (check all that apply):

☐ Federal officials (a *Bivens* claim)

☒ State or local officials (a § 1983 claim)

B. Section 1983 allows claims alleging the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” 42 U.S.C. § 1983. If you are suing under section 1983, what federal constitutional or statutory right(s) do you claim is/are being violated by state or local officials?

Defendant's in violation of 18 U.S.C. § 241 and 242 deprived plaintiff's right to contract and travel acting "under color of law" assaulted, falsely arrested and imprisoned by way of fraud.

C. Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional rights. If you are suing under *Bivens*, what constitutional right(s) do you claim is/are being violated by federal officials?

D. Section 1983 allows defendants to be found liable only when they have acted “under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia.” 42 U.S.C. § 1983. If you are suing under section 1983, explain how each defendant acted under color of state or local law. If you are suing under *Bivens*, explain how each defendant acted under color of federal law. Attach additional pages if needed.

Defendant's misrepresenting 2151835 conspired to deprive plaintiff's constitutional rights, privileges and immunities denying civil right in violation of 42 U.S.C. § 1983, 1981, 1985.

III. Statement of Claim

State as briefly as possible the facts of your case. Describe how each defendant was personally involved in the alleged wrongful action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

A. Where did the events giving rise to your claim(s) occur?

The events giving rise to claim occurred at 1520 N Hartford Ave., Tulsa, OKla. 74106 in Tulsa County.

B. What date and approximate time did the events giving rise to your claim(s) occur?

The events giving rise to claim occurred around about 4:00 P.M.

C. What are the facts underlying your claim(s)? (For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)

The plaintiff in pursuit of happiness was issued several unwarranted contracts to impede constitutional rights privileges, and immunities after personal for Tulsa County City library through invasion of privacy alarmed City of Tulsa, Tulsa County Officials. The Plaintiff was unlawfully trespassed from Tulsa County City Library in response to private contracts against Tulsa, Tulsa County Officials. The plaintiff was subsequently arrested for unwarranted contracts after Tulsa County City library personal notified Tulsa Police that plaintiff was trespassing. Plaintiff was falsely arrested and imprisoned losing private or personal property after Oklahoma Statute 21 § 1835 was misrepresented depriving plaintiff of (6th) Amendment right to confrontation deny equal protection and due process of the law in accordance with (14th) Amendment.

IV. Injuries

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

Pain and suffering, including physical discomfort, emotional distress and mental anguish, loss of enjoyment of life, loss of consortium, emotional disorders, including PTSD, anxiety, and depression, loss of society, care, attention, protection, companionship, assistance, advice, guidance, counsel, instruction, education, and training, any other intangible loss, loss of income, property damage, other out-of-pocket expenses, loss of profits from trade secret theft, loss of business value due to reputation, loss of earning capacity.

V.

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

Declaratory relief, Equitable relief - Injunction, Rescission, Rectification, Account of profits. Punitive Damages, Damages, Compensatory damages, Consequential damages, Expectation damages, Nominal damages, Liquidated damages, Mitigated damages, actual damages and any other damage as the court sees fit. Temporary injunction against TULSA POLICE DEPARTMENT AND TULSA POLICE AND TULSA COUNTY SHERIFF'S OFFICE AND TULSA COUNTY SHERIFF'S - TEMPORARY RESTRAINING ORDER

VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 08/09/, 2024.

Signature of Plaintiff 

Printed Name of Plaintiff Brande-L. Samuels

B. For Attorneys

Date of signing: _____, 20__.

Signature of Attorney _____

Printed Name of Attorney _____

Bar Number _____

Name of Law Firm _____

Address _____

Telephone Number _____

E-mail Address _____

UNITED STATES DISTRICT COURT
For the
Northern District of Oklahoma
_____ Division

BRANDE LEE SAMUELS,
Plaintiff(s),

-v-

CITY OF TULSA, Et. Al.
Defendant.

) Case No. _____
) (to be filed by Clerk's Office)
)
)
) Jury Trial (Check one) ☒ Yes ☐ No
)
)
)
)
)

**COMPLAINT FOR VIOLATION OF CIVIL RIGHTS
(Non- Prisoner Complain)**

COMES NOW, Plaintiff, Brande L. Samuels, Esq., propria persona in an action¹ in
the above style complaint hereby petitioning this honorable court hereto in violation of civil
rights for the purpose of ascertaining the truth and fact as stating the following

¹ **D.C. Code § 28: 1-201. Definitions** (1) "Action" in the sense of a judicial proceeding includes recoupment, counterclaim, set-off, suit in equity and any other proceedings in which rights are determined.

shall be subscribed by the declarant as true under penalty of perjury, and dated, in substantially the following form:

I, Brande L. Samuels, Esq. declare (or certify, verify, or state) under penalty of perjury that the forgoing is true and correct. Executed 10/19/2022.

CERTIFICATE OF MAILING

I, Brande L Samuels, Esq. hereby certify that a true and correct copy, to which this is attached, was mailed on this ^{09 August 24} ~~19~~ day of ~~October 2022~~ and mailed to:

Respectfully Submitted,

UCC Code 28: 1-207 "Without Prejudice"

Mr. Brande L. Samuels, Esq.

General Delivery

Tulsa, Oklahoma Exempt, Non-Domestic [74103]

IN WITNESS WHEREOF, the said party has signed and sealed these presents the day and year first above written.

Signed, sealed, and delivered in the presence of: Brande L. Samuels, Esq.

Signature (UCC Code 28: 1-207 "Without Prejudice")

STATE OF OKLAHOMA, COUNTY OF TULSA

I HEREBY CERTIFY that on this day before me, an officer duly qualified to take acknowledgments, personally appeared Brande Samuels, who has produced _____ as identification and who executed the foregoing instrument and he acknowledged before me that he executed the same.

WITNESS my hand and official seal in the County and State aforesaid this _____ day of _____ 2021.

Notary Public Printed Name:

My commission expires

BRANDE L. SAMUELS
GENERAL DELIVERY
TULSA OKLAHOMA [74103]
NON-Domestic / NON-ASSUMPT

RECEIVED

AUG 13 2024

Heidi D. Campbell, Clerk
U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OKLAHOMA
ATT: HEIDI D. CAMPBELL
333 W. 4TH STREET, ROOM 411
TULSA, OK. 74103

24 CV - 375 JFH - MTS

postmark unknown

